

# EXHIBIT 16

**St. John, Joseph**

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**From:** Sadik.Huseny@lw.com  
**Sent:** Wednesday, September 23, 2020 10:47 AM  
**To:** Alexander.V.Sverdlov@usdoj.gov; St. John, Joseph  
**Cc:** steven.bauer@lw.com; Amit.Makker@lw.com; Shannon.Lankenau@lw.com; rick.bress@lw.com; Melissa.Sherry@lw.com; Anne.Robinson@lw.com; Tyce.Walters@lw.com; Genevieve.Hoffman@lw.com; Gemma.Donofrio@lw.com; kclarke@lawyerscommittee.org; jgreenbaum@lawyerscommittee.org; erosenberg@lawyerscommittee.org; dspence@lawyerscommittee.org; asaini@lawyerscommittee.org; mjordan@lawyerscommittee.org; pchaudhuri@lawyerscommittee.org; mike.feuer@lacity.org; kathleen.kenealy@lacity.org; danielle.goldstein@lacity.org; mike.dundas@lacity.org; weiserw@brennan.law.nyu.edu; wolf@brennan.law.nyu.edu; percivalk@brennan.law.nyu.edu; legalwebmail@ci.salinas.ca.us; michaelmu@ci.salinas.ca.us; dmcpaul@nndoij.org; jasearle@nndoij.org; mrosenbaum@publiccounsel.org; rbalabanian@edelson.com; lhough@edelson.com; dpongtrace@akingump.com; dfrommer@akingump.com; Rebecca.hirsch2@cityofchicago.org; David.Holtzman@hklaw.com; Brad.Rosenberg@usdoj.gov; FedProg.ECF@usdoj.gov; david.m.morrell@usdoj.gov; alexander.haas@usdoj.gov; Dan.Mauler@usdoj.gov; Murrill, Elizabeth; brad@benbrooklawgroup.com; Kollmeyer, Josiah  
**Subject:** RE: National Urban League et al v. Ross, No. 5:20-cv-05799-LHK (N.D. Cal.)

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Hi Scott,

We're a little confused about the timing of your potential motion here, as our lawsuit was filed over a month ago, and Louisiana's Attorney General could have reached out to us a long time ago to discuss the case/talk through any relevant issues. Given the current procedural posture, we would need to know a bit more before agreeing to anything regarding a potential motion or related briefing.

Let's proceed in this fashion. Please send us whatever motion Louisiana/any other states intend to file. Also, please let us know who at the Louisiana Governor's office you've been in touch with, along with those folks at other states you have reached out to, so that we may understand the relevant constituencies and claimed interests at play. Once we have your motion and that information, I'd be happy to get on a call with you to meet and confer; I would also be in position to separately meet and confer with the other relevant state actors. And all of that would allow us to gauge our position about the claimed interests at issue that would drive any motion to intervene, and let you know Plaintiffs' position on any such intervention.

Many thanks.

Sadik

**Sadik Huseny | LATHAM & WATKINS LLP**  
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**From:** Sverdlov, Alexander V. <Alexander.V.Sverdlov@usdoj.gov>  
**Sent:** Wednesday, September 23, 2020 5:33 AM  
**To:** St. John, Joseph <StJohnJ@ag.louisiana.gov>  
**Cc:** Bauer, Steve (Bay Area) <steven.bauer@lw.com>; Huseny, Sadik (Bay Area) <Sadik.Huseny@lw.com>; Makker, Amit (Bay Area) <Amit.Makker@lw.com>; Lankenau, Shannon (Bay Area) <Shannon.Lankenau@lw.com>; Bress, Rick (DC) <rick.bress@lw.com>; Sherry, Melissa (DC) <Melissa.Sherry@lw.com>; Robinson, Anne (DC) <Anne.Robinson@lw.com>; Walters, Tyce (DC) <Tyce.Walters@lw.com>; Hoffmann, Genevieve (DC) <Genevieve.Hoffmann@lw.com>; Donofrio, Gemma (DC) <Gemma.Donofrio@lw.com>; kclarke@lawyerscommittee.org; jgreenbaum@lawyerscommittee.org; erosenberg@lawyerscommittee.org; dspence@lawyerscommittee.org; asaini@lawyerscommittee.org; mjordan@lawyerscommittee.org; pchaudhuri@lawyerscommittee.org; mike.feuer@lacity.org; kathleen.kenealy@lacity.org; danielle.goldstein@lacity.org; mike.dundas@lacity.org; weiserw@brennan.law.nyu.edu; wolf@brennan.law.nyu.edu; percivalk@brennan.law.nyu.edu; legalwebmail@ci.salinas.ca.us; michaelmu@ci.salinas.ca.us; dmcpaul@nndoij.org; jasearle@nndoij.org; mrosenbaum@publiccounsel.org; rbalabanian@edelson.com; lough@edelson.com; dpongtrace@akingump.com; dfrommer@akingump.com; Rebecca.hirsch2@cityofchicago.org; David.Holtzman@hklaw.com; Rosenberg, Brad (CIV) <Brad.Rosenberg@usdoj.gov>; ECF, FedProg (CIV) <FedProg.ECF@usdoj.gov>; david.m.morrell@usdoj.gov; alexander.haas@usdoj.gov; Mauler, Dan (CIV) <Dan.Mauler@usdoj.gov>; Murrill, Elizabeth <MurrillE@ag.louisiana.gov>; Bradley Benbrook <brad@benbrooklawgroup.com>; Kollmeyer, Josiah <KollmeyerJ@ag.louisiana.gov>  
**Subject:** Re: National Urban League et al v. Ross, No. 5:20-cv-05799-LHK (N.D. Cal.)

Scott,

Please represent the Defendants' position as follows:

"Defendants consent, but respectfully urge the Court not to delay resolution of Plaintiffs' motion for a preliminary injunction."

Thanks,  
Aleks Sverdlov

On Sep 22, 2020, at 7:41 PM, St. John, Joseph <[StJohnJ@ag.louisiana.gov](mailto:StJohnJ@ag.louisiana.gov)> wrote:

Counsel:

As previously indicated, the State of Louisiana, potentially joined by other States, intends to intervene in the above-captioned matter. In view of the district court's stated intent to issue a ruling within 48 hours, Louisiana contemplates filing its motion tomorrow morning. Louisiana will also move for expedited action and – to the extent any party opposes – a shortened response time of 24 hours. Please let me know your position by 08:00 a.m. Central tomorrow, September 23, 2020.

Don't hesitate to call with any questions or if you would like to meet-and-confer via telephone.

Best regards,  
Scott

<image001.png>

**Joseph Scott St. John**

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